

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE BRASKEM, S.A., SECURITIES  
LITIGATION

Civil Action No. 15-CV-5132-PAE

**NOTICE OF MOTION AND UNOPPOSED MOTION FOR  
ENTRY OF A CLASS DISTRIBUTION ORDER**

PLEASE TAKE NOTICE THAT pursuant to the Stipulation and Agreement of Settlement dated September 14, 2017 (ECF No. 121, the “Settlement”),<sup>1</sup> and the Order and Final Judgment entered February 21, 2018 (ECF No. 132), Boilermaker-Blacksmith National Pension Trust (“Lead Plaintiff”), requests by this motion (the “Motion”) entry of a Class Distribution Order which, among other things, will: (i) approve the administrative determinations of the Claims Administrator Garden City Group, LLC in accepting and rejecting the Claims submitted by Claimants; (ii) approve distribution of the Net Settlement Fund to Authorized Claimants; and (iii) authorize the destruction of paper copies of Proof of Claim Forms and electronic copies of Claim records after an appropriate amount of time has elapsed following distribution of the Net Settlement Fund.

Lead Counsel have given Defendants advance notice of this Motion, and confirmed that Defendants do not plan to oppose the Motion. Lead Counsel are aware of no opposition to this Motion.

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<sup>1</sup> Unless otherwise noted, capitalized terms have the meanings set forth in the Settlement.

For the Court's convenience, a proposed Class Distribution Order is submitted with this Motion. The proposed Class Distribution Order filed herewith confirms the Settlement's provisions for re-distribution of any residue of the Net Settlement Fund. Because the Motion is unopposed, Lead Counsel respectfully submit that the Motion may be decided without a hearing.

Dated: November 16, 2018

Respectfully submitted,

**COHEN MILSTEIN SELLERS & TOLL PLLC**

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